



UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

FRANKLIN CONSTRUCTION GROUP, LLC )  
v. )  
Plaintiff, )  
Case No. 3:24-cv-01255  
WILLIAM SHORE, JWSC, LLC, KEITH MEADOWS, )  
JOSEPH HEATH, HYDS, INC., DEAN BINGHAM, )  
LUNDON JOHNSON, TYLER WEBER, JOEL )  
CHEVRETTE, DANNY KNOWLES, SCOTT )  
MATTHEWS, and LOWE'S HOME CENTERS, INC., )  
Defendants. )

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSIVE PLEADING**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule 6.01, Defendant, Dean Bingham (“Defendant”), respectfully requests that this Court grant an extension of time to file a pleading or motion in response to Plaintiff’s Complaint, setting the deadline as January 17, 2025. In support of this request, Defendant states as follows:

1. Defendant was served on November 8, 2024. Thus, the current deadline to file an answer or Rule 12 motion is twenty-one days later, on Friday, November 29, 2024. *See* Fed. R. Civ. P. 12.

2. Under Rule 6(b)(1)(A), the Court may “for good cause” extend the time within which an act may or must be done. Here, there is good cause to grant Defendant’s requested extension.

3. Counsel for Defendant was just retained and due to the complex issues implicated by this action, Defendant respectfully requests additional time to analyze Plaintiff’s claims and fully explore its defenses.

4. Counsel for Plaintiff and Defendant conferred by e-mail regarding this motion.

Plaintiff's counsel agreed to the requested extension.

5. There is good cause to grant Defendant's request for additional time, until January 17, 2025, to prepare its responsive pleading or motion.

Respectfully submitted,

/s/ Scarlett S. Nokes  
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*Attorney for Defendant, Dean Bingham*

## **CERTIFICATE OF SERVICE**

I hereby certify that on this the 27<sup>th</sup> day of November 2024, the foregoing *Notice of Appearance* was filed electronically with the Clerk of Court to be served by the Court's electronic filing system upon the parties in this matter.

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